

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

WESTMOUNT GROUP, INC.,

Debtor.

Case No. 21-30633-HCM-7

Chapter 7

**BRAD W. ODELL, CHAPTER 7
TRUSTEE,**

Plaintiff,

V.

**TECHROVER, INC. and
KEYVAN PARSA,
Defendants**

ADVERSARY NO. 22-03004-hcm

AFFIDAVIT OF BRAD W. ODELL IN SUPPORT OF ENTRY OF DEFAULT

THE STATE OF TEXAS

COUNTY OF LUBBOCK

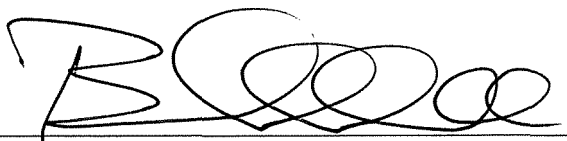
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BEFORE ME, the undersigned authority, on this day personally appeared Brad W. Odell, in his capacity as Chapter 7 Trustee, who is personally known to me, and first being duly sworn according to law, upon his oath deposed and said:

1. “My name is Brad W. Odell, I am the Chapter 7 Trustee for the bankruptcy case of Westmount Group, Inc., and I am the Plaintiff in the above-styled cause of action. I am at least 18 years of age, of sound mind, and capable of making this Affidavit, which is true and correct and based on my personal knowledge and is made voluntarily and not under duress. I have never been convicted of a felony or a crime involving moral turpitude.
2. “I have personal knowledge of the exhibits referenced hereto and attached to this Affidavit based on my role as the Chapter 7 Trustee of the bankruptcy case of the Westmount Group, Inc. (the “Debtor”) and my involvement as Plaintiff in the above-styled cause of action.
3. “I retained the law firm of Mullin Hoard & Brown, L.L.P. to represent me in this adversary proceeding.
4. “Plaintiff filed his Original Complaint against Techrover, Inc. and Keyvan Parsa (collectively, the “Defendants”) on April 19, 2022. A summons was duly issued by the Clerk of the Bankruptcy Court on April 19, 2022.

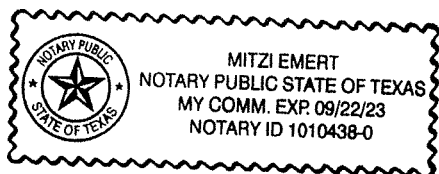
5. "As evidenced by the Certificates of Service on file with the Court, the Defendants were personally served with the summons and a copy of the Complaint on April 22, 2022.
6. "Defendants' deadline to answer Plaintiff's Original Complaint or to otherwise file a responsive pleading to Plaintiff's Original Complaint was due thirty (30) days from the date the summons was issued. Thus, Defendants were required to file an answer or other responsive pleading on or before May 19, 2022.
7. "More than thirty (30) days have passed since the Defendants were personally served.
8. "As of the date of the filing of Plaintiff's Request for Entry of Default, neither Defendant has filed an answer or other responsive pleading to defend the case.
9. "The following exhibits attached to Plaintiff's Request for Entry of Default are true and correct copies of the originals:
 - a. Exhibit "A" - Plaintiff's Original Complaint, filed of record on April 19, 2022 at Docket No. 1.
 - b. Exhibit "B" – Summons issued on April 19, 2022 at Docket No. 2.
 - c. Exhibit "C" – Certificate of Service for Defendant Techrover, Inc, which was personally served onto its registered agent on April 22, 2022, at 810 N. Kansas, El Paso, Texas 79902, along with a copy of Plaintiff's Original Complaint, at Docket No. 3.
 - d. Exhibit "D" Certificate of Service for Keyvan Parsa, which was personally served on April 22, 2022, at 810 N. Kansas, El Paso, Texas 79902, along with a copy of Plaintiff's Original Complaint, at Docket No. 4.
10. "As Chapter 7 Trustee, I conducted the creditors' meeting of the Debtor. Defendant, Keyvan Parsa, appeared as the representative of the Debtor and testified at the creditors' meeting. I have also had multiple telephone conversations with Keyvan Parsa during the case. Additionally, Keyvan Parsa has appeared and participated at several hearings before the Court prior to and after the Debtor's case was converted to chapter 7. Based on my interactions with Keyvan Parsa and his participation in the Debtor's bankruptcy case, I have personal knowledge that Keyvan Parsa is not a minor, incompetent person, or in military service."

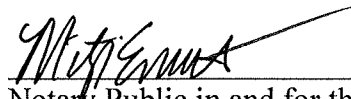
Further Affiant Sayeth Naught.



Brad W. Odell, Chapter 7 Trustee

SWORN TO and SUBSCRIBED before me on this the 26th day of May 2022, by Brad W. Odell, as Chapter 7 Trustee.





Notary Public in and for the State of Texas